

Rios, Jacqueline

From: Rios, Jacqueline
Sent: Monday, August 04, 2014 3:53 PM
To: 'Mahatma, Sudhir (DEC)'
Subject: RE: Outfall 25A - Lafarge (NY 000 5037) Your comment # 3

Mr. Mahatma,

Thank you for providing me with a revised proposed permit for Lafarge Building Materials, Inc. for review based on the comments that EPA provided to NYSDEC on May 19, 2014. In the May 19, 2014 letter, the EPA provided nine comments on the draft permit that was provided to the EPA on April 28, 2014. In review of the proposed permit, you have adequately addressed our comments on the Biological Monitoring Plan, Description of Monitoring Location, Outfall 25 A – Non-Contact Cooling Water Dissolved Solids, Footnotes, Outfalls 006 and 007 – Stormwater Dissolved Solids, Outfall 007 – Monitoring Frequency, Outfall 21 – Effective Date, and Outfall 027 – Monitoring Requirement. However, the EPA's comments "Outfall 23A -- Pathogen Criteria" has not been adequately addressed. At this time, EPA cannot concur with the pathogen provision for Outfall 023A in the Lafarge Building Materials, Inc. permit.

Please feel free to call me with any questions.

Thanks,

Jacqueline Ríos, Acting Chief
NPDES Section, Clean Water Regulatory Branch
EPA Region 2, CWD
Phone: 212-637-3859

From: Mahatma, Sudhir (DEC) [mailto:sudhir.mahatma@dec.ny.gov]
Sent: Monday, August 04, 2014 2:42 PM
To: Rios, Jacqueline
Subject: Outfall 25A - Lafarge (NY 000 5037) Your comment # 3

Ms. Rios:

Please find attached a revised draft SPDES that addresses the USEPA concerns discussed today during our teleconference at 1:00 PM.

1. Outfall 020 – Effective date is Sept. 2014 (page 8 of the permit)
2. Outfall 25A – Weekly Monitoring of TDS for 10 weeks as requested by the USEPA. (page 10 of the permit)
3. Biological Monitoring – Please see # 3 – Verification of Monitoring Reporting (page 16 of the permit)

If you have any question, please contact me immediately.

Thank you in advance,

Sudhir

Ms. Rios:

Thanks for your time to discuss the comment #3 about Outfall 25A.

This outfall is terminated in June 2016.

Page 22 of the permit indicates that the Hudson River water is used as Non-Contact cooling water. The 95%ile/99%ile concentration of the TDS is 164 mg/l /200 mg/l in the river water (based on 2008-2013 RIBS data for Lower Hudson River in Bethlehem station ID # 1300139).

The river water is merely heated in the process and discharged as Outfall 25A.

We discussed the DEC rationale why additional monitoring for TDS is not required.

I contacted Chuck Nieder and Colleen Kimble about your comment #1 – Biological Monitoring Plan.

1:30 PM today is convenient to all of us for a teleconference to discuss further your comments. Please let me know if it is not convenient to you.

We will call you at 212-637-3859, assuming you are available, as indicated by you during our morning phone conversation.

We will talk to you soon.

Sincerely,

Sudhir Mahatma, P.E.

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